

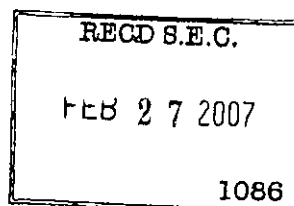
Director  
Securities Operations



07045341

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t 212.656.5026 | f 212.656.5893  
pmadho@nyse.com

*OK*  
*1385632*



**NYSE Group**

February 27, 2007

*1-33369*

Mr. Brian Johnson  
Branch Chief  
Securities and Exchange Commission  
Branch of Filer Support 2  
Room 2531  
100 F Street, NE  
Washington, DC 20549

**PROCESSED**

**APR 19 2007**

**THOMSON  
FINANCIAL**

*B*

Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Exchange Act of 1933, ING Asia Pacific High Dividend Equity Income Fund, Common shares of beneficial interest, \$0.01 Par Value Per Share. The NYSE requests simultaneous acceleration of registration of the Securities Exchange Act of 1934, together with the 1933 Act. Adequate distribution assured. Form 8-A received on February 27, 2007. Tentative listing date - Not yet determined.

Sincerely,

*[Signature]*

**END**